

SAMUEL T. POOLE

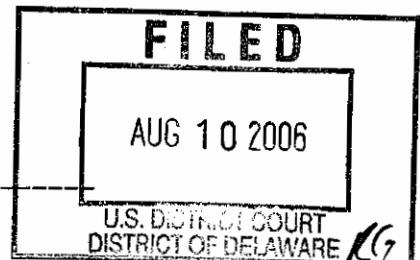
CA.NO.99-635

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SUE L. ROBINSON

STAN TAYLOR AND
RAPHEL WILLIAM

REPLY TO THE DEFENDANT PETITION



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Here come Samuel Poole., A couple of complaints about the discovery temperture survey (D00455 to D00458) and (A0060 to 71 it was taken a about year away from the complaint I was there March 23, 1999. til Sept 17, 1999 approx. time my problem was was all on the old side of the jail which happen to be pre trial the survey 8-22-00., this has nothing to do with the time poriod I was there (It was between Jan. 1999 til Dec. 1999.).

But you sent me grievance from Jan to Oct theys grievance shows poor maintance on the (Air Cond. and Heating system or central air).,there is no repair slip or records of the repairs(far as work order there is none) .but I am aware of the outside Plummer came in after the maintance tried to fix it (there is no record of it been sent to me (D00315 and D00330 and D00331 to D00400., there are atotal of three different reading (1. Hallway and Guard both 2.Dayroom 3.Cell there is no reading at all.

this shows inmates was freezeing and every where else it was fine and comforble but the cells freezeing so bad my feet num with my cloths on did not help the grievance show this and more such as bugs crawling around spiders also.

Humane cond. 8th amendment crual and unusal punishment(go to sleep in the freezer with everthing on such as cloth andblacket sheets and your feet still num early in the mourning get so cold you got to get up.,this went on for about a month until I was move from that cell.

The summer month of July and August air cond. off three man in the cell walls sweatting and the floor ,toilet mattress sweatting this was a normal thing inside of the cells while the air is off .

The day I have fallen in the closet of 2-M-Podfrom the low lighting the sink was filled with and going on the floor this been going on sense i was over there the water been sitting there for months before i gotten there it was so slippery remind me of (Algae from the dirty mop water that was thrown inthe sink),,after

I fallen into the closet they called a code this is the injury that i have suffer and then place back on the floor back on 2-M-Pod .,this petition clearly show the injurys that I have suffer while I was there .

Missing

1. incident report not in the box
- 2.individual count that goes on about 6 times a day that goes to the raphel Raphel Williams and Stan Taylor all of gander hill block by block the ,Fittness center , gym ,and where ever you house them at booking also
3. lic.of the DR. that work on me.
- 4.I need to no the max. that Gander Hill hold.

Wherefore your still under sanctions and the order of the judge.,far as the summary judgement that should of been dissmis without pregdice because you refuse to bring the discovery this case should be headed to a jury.

8-4-2006

Respecfully Submitted

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